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Attorneys for Plaintiff

Japan Corporate News Network K.K.,

a California Partnership

dba Asia Corporate News Network

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Japan Corporate News Network K.K., a
California Partnership, dba Asia
Corporate News Network,

Plaintiffs,

vs.

ACNNEWSWIRE.COM, an Internet
domain name;

ACNNEWSWIRE.ORG, an Internet
domain name;

ACNNEWSWIRE.NET, an Internet
domain name;

ACN-NEWSWIRE.COM, an Internet
domain name; and

ACN-NEWSWIRE.NET, an Internet
domain name,

Defendants.

Case No. C-07-05061-SI

**NOTICE OF SETTLEMENT;
STIPULATED DISMISSAL OF
COMPLAINT AND TRANSFER OF
DOMAINS; [PROPOSED] ORDER**

**NOTICE OF SETTLEMENT; STIPULATED
DISMISSAL OF COMPLAINT AND TRANSFER OF
DOMAINS**

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1 WHEREAS, on October 1, 2007, Japan Corporate News Network K.K., a
2 California Partnership, dba Asia Corporate News Network ("JCN") filed a Complaint (the
3 "Complaint") against ACNNEWSWIRE.COM, an Internet domain name;
4 ACNNEWSWIRE.ORG, an Internet domain name; ACNNEWSWIRE.NET, an Internet
5 domain name; ACN-NEWSWIRE.COM, an Internet domain name; and ACN-
6 NEWSWIRE.NET, an Internet domain name (collectively, the "ACN Domains");

7 WHEREAS, Timothy Mckinnon ("Mckinnon") is the registrant of record of the ACN
8 Domains;

9 WHEREAS, the Registrar of the ACN Domains, Godaddy.com, Inc., has placed
10 the ACN Domains on Registrar Lock and informed the Court via declaration dated
11 October 3, 2007 that "the Domain Names should be construed to be under the dominion
12 and control of the court until such time as GoDaddy.com, Inc. receives further instruction
13 with regard to the Domain Names";

14 WHEREAS, Mckinnon and JCN have reached a settlement which includes a
15 transfer of the ACN Domains, and a dismissal of the Complaint without prejudice;

16 WHEREAS, Mckinnon and JCN request that the Court give final direction to the
17 Registrar, GoDaddy.com, Inc., as to the dominion and control of the ACN Domains which
18 now reside with the Court;

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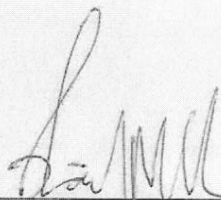
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IT IS HEREBY STIPULATED AND AGREED by and between JCN and Mckinnon
that:

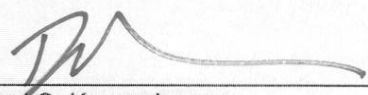
- (1) The ACN Domains shall be transferred to JCN, via its General Partner, Bruce Porter; and,
- (2) The Complaint shall be dismissed without prejudice.

DATED: October 2³, 2007

By: 
Timothy Mckinnon, Registrant of
Record of the ACN Domains

DATED: October 2³, 2007

KRONENBERGER BURGOYNE, LLP

By: 
Karl S. Kronenberger
Deepa Krishnan
Attorneys for Plaintiff, Japan Corporate
News Network K.K., a California
Partnership, dba Asia Corporate News
Network

[PROPOSED] ORDER

Based on the foregoing stipulation, and good cause appearing therefore, **IT IS
HEREBY ORDERED** that:

(1) Godaddy.com, Inc. shall unlock the following Domains and transfer them to
JCN, via its General Partner, Bruce Porter:

ACNNEWSWIRE.COM;
ACNNEWSWIRE.ORG;
ACNNEWSWIRE.NET;
ACN-NEWSWIRE.COM;
ACN-NEWSWIRE.NET; and,

(2) This Action shall be dismissed without prejudice.

IT IS SO ORDERED.

Dated: _____, 2007



Hon. Susan Illston
United States District Judge

1 **PROOF OF SERVICE**

2 I am a resident of the state of California, over the age of eighteen years and not a
3 party to this action. My business address is 150 Post Street, Suite 520, San Francisco,
4 California, 94108.

5 On October 23, 2007 I served the following document(s):

6 **1. NOTICE OF SETTLEMENT; STIPULATED DISMISSAL OF COMPLAINT
7 AND TRANSFER OF DOMAINS; [PROPOSED] ORDER**

8 on the parties listed below as follows:

9 Timothy McKinnon
10 PO BOX Q1299
11 Queen Victoria Building
12 Sydney, New South Wales 1230
13 Australia
14 mckint@ecomm.net.au
15 **[Courtesy copy]**

16 Diane E. Whiting
17 Domain Services
18 Godaddy.com, Inc.
19 14455 N. Hayden Rd., Suite 219
20 Scottsdale, AZ 85260
21 domaindisputes@godaddy.com
22 **[Courtesy copy]**



24 BY FIRST CLASS MAIL, by placing a true copy thereof in a sealed
25 envelope, with postage thereon fully prepaid, for collection and mailing, in
26 San Francisco, California, following ordinary business practices, which is
27 deposited with the US Postal Service the same day as it is placed for
28 processing.



BY EMAIL to the addresses listed above.



(Federal) I declare that I am employed in the office of a member of the bar
of this court at whose direction the service was made.



Pete Touschner